

**STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION**

Illinois-American Water Company

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Proposed general increase in  
water and sewer rates

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Docket No. 07-0507

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**STAFF MOTION FOR LEAVE TO FILE  
CORRECTED TESTIMONY *INSTANTER***

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Staff of the Illinois Commerce Commission, by and through its undersigned attorneys, and pursuant to Part 200.190 of the Illinois Commerce Commission's Rules of Practice (83 Ill. Admin. Code Part 200.190), hereby moves for leave to file *instanter* the accompanying Corrected Rebuttal Testimony of Mike Luth (ICC Staff Ex. 17.0-C) and Cheri Harden (ICC Staff Ex. 15.0-C), along with the respective associated Schedules. In support of this motion, Staff states as follows:

The Rebuttal Testimony of Mike Luth (ICC Staff Ex. 17.0) and Cheri Harden (ICC Staff Ex. 15.0) were filed on March 4, 2008. Recently, Staff learned that certain aspects of these two Staff witnesses' schedules were inadvertently inconsistent, which could lead to confusion in the record. Specifically, Staff witness Cheri Harden's Schedules 15.3 through 15.5 inadvertently used inconsistent units of measure, using 100 cubic foot rate for current rates and 1,000 gallon rate for proposed rates. Accordingly, Staff has corrected this inconsistency in the attached ICC Staff Ex. 15.0-C, Schedules 15.3-CMW (corrected) through 15.5-CMW (corrected).

Similarly, Staff witness Mike Luth's Schedule 17.2 SB contained proposed Rates that did not fully comport with the Proposed Rates found on Schedule 17.1 SB.

Consequently, Staff has corrected these inconsistencies in the attached ICC Staff Ex. 17.0-C, Schedule 17.2-SB-C. Although no changes were made to the testimony of either Mike Luth or Cheri Harden, Staff is re-filing complete corrected versions of ICC Staff Ex. 17.0-C (Luth Rebuttal) and ICC Staff Ex. 15.0-C (Harden Rebuttal), along with all associated Schedules.

Staff Moves for Leave to File these Corrections *instantly* in an effort to maintain a complete and accurate record.

WHEREFORE, for the reasons set forth above, Staff respectfully moves for leave to file the Corrected Rebuttal Testimony of Mike Luth (ICC Staff Ex. 17.0-C) and Cheri Harden (ICC Staff Ex. 15.0-C).

Respectfully submitted,

/s/  
Linda M. Buell  
Michael J. Lannon

Staff Attorneys

Counsel for the Staff of the Illinois  
Commerce Commission

March 18, 2008